

Meeting Minutes Transmittal - Approved

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
740 STVCN, RM 1320
Richland, Washington

Meeting Held August 11, 1993
From 10:00 am to 12:00 noon

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The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Unit Managers Meeting.

Randall N. Krekel
Randall N. Krekel, Unit Manager, RL

Date: 9-8-93

Not present.

Daniel L. Duncan, RCRA Program Manager, EPA Region 10

Date: _____

Alisa D. Huckaby
Alisa D. Huckaby, Unit Manager, Washington State Department of Ecology

Date: 9-8-93

4843 Alkali Metals Storage Facility, WHC Concurrence

Fred A. Ruck III
Fred A. Ruck III, Contractor Representative, WHC

Date: 9/8/93

Not present.

J. A. (Mickey) Seamans, Contractor Representative, WHC

Date: _____

Purpose: Discuss Permitting Process

Meeting Minutes are attached. The minutes are comprised of the following:

- Attachment 1 - Agenda
- Attachment 2 - Summary of Discussion and Commitments/Agreements
- Attachment 3 - Attendance List
- Attachment 4 - Action Items
- Attachment 5 - 4843 AMSF NOD RESPONSE TABLE COMMENTS PROPOSED FOR CONSOLIDATION
- Attachment 6 - COMMENTS ON THE DRAFT HANFORD FACILITY PERMIT, PP. 36 TO 39.

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Attachment 1

**Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
740 STVCN, RM 1320
Richland, Washington**

**Meeting Held August 11, 1993
From 10:00 am to 12:00 noon**

Agenda

1. Approval of Past UMM Minutes
2. Status Action Items
 - 7/14/93:1
 - 7/14/93:2
3. Status Closure Activities
 - Status of NOD comments
 - NOD Comment Consolidation
 - Clarification of NOD Comment No. 62
 - Information Provided to Ecology
4. New Business
5. Set Next Meeting Date

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Attachment 2

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
740 STVCN, RM 1320
Richland, Washington

Meeting Held August 11, 1993
From 10:00 am to 12:00 noon

Summary of Discussion and Commitments/Agreements

1. Approval of Past UMM Minutes

The July 14, 1993 meeting minutes were reviewed and approved.

2. Status Action Items

- 7-14-93:1 Pending; awaiting removal of waste from 4843 AMSF and scheduling of the survey.
- 7-14-93:2 Pending; awaiting removal of waste from 4843 AMSF and scheduling of the survey.

3. Status Closure Activities

- Status of NOD comments

The Notice of Deficiency (NOD) comments on the 4843 Alkali Metal Storage Facility Closure Plan are currently being responded to by RL/WHC. WHC (J. G. Adler) stated that a request for extension letter was being prepared. The letter requests a 45-day extension. This changes the due date from September 20, 1993 to November 4, 1993. The extension is being requested because of the 40 new comments from Ecology and to equalize the workload with other closure plans.

- NOD Comment Consolidation

RL/WHC proposed consolidating some of the comments on the NOD Response Table. This would eliminate some of the duplicate comments from the table. However, the proposal identifies which comments will be consolidated and maintains traceability and accountability so comments will not be lost. WHC provided a handout (attachment 5) identifying which comments are proposed for consolidation.

Ecology (A. D. Huckaby) stated that the idea sounds good but that Ecology will need to review the proposal. Ecology took an action (8-11-93:1) to review attachment 5 and provide an answer by the next UMM. Ecology also requested that a single sheet be developed that identifies all of the consolidated comments. WHC (J. G. Adler) took an action (8-11-93:2) to develop that sheet by the next UMM. RL (R. N. Krekel) also assured Ecology that the cover letter transmitting

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the NOD Response Table would also include an explanation of the comment consolidation.

- Clarification of NOD Comment No. 62

WHC (J. G. Adler) requested clarification on NOD Response Table Comment No. 62. Specifically, is the reference to EII 5.4 correct? Ecology (A. D. Huckaby) stated that yes, it is. The comment is asking which method, EII 5.4 or EII 5.5, is used to decontaminate the equipment prior to sampling. WHC stated that this provides the necessary clarification.

- Information Provided to Ecology

Per Ecology's request, copies of the following documents have been informally provided to Ecology: a Radiation Work Permit, a Hazardous Waste Operations Permit, and a Tri-Party Agreement Handbook.

4. New Business

- Authority over Radionuclides

The issue of the appropriate level of discussion in the closure plan on radiological concerns for the TSD unit was discussed. RL (R. N. Krekel) stated that they were willing to provide information on any radiological surveys, etc., but RL has jurisdiction over radioactive material at the TSD. RL asserts that the plan covers closure as it relates to dangerous waste per WAC 173-303 "Dangerous Waste Regulations." Information on radiological cleanup will be addressed per the Tri-Party Agreement and will be consistent with how it is addressed in other similar closure plans. Also, a copy of the RL/WHC comments, relative to authority over radionuclides, on the 1992 version of the Draft Hanford Facility Dangerous Waste Permit (attachment 6) was provided to Ecology.

Ecology (A. D. Huckaby) stated the Ecology considers that they do have jurisdiction over the radiological components. Ecology stated that much greater detail on radiological clean-up is needed for an acceptable closure plan. Ecology also stated that prior to the submission of revision 1, the issue of including radiological information in the closure plan needs to be resolved. The resolution of this issue is needed to support the identification of the data quality objectives.

5. Set Next Meeting Date

The next meeting has been set for September 8, 1993, for 8:30 am in Richland, Washington.

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Meeting Held August 11, 1993
From 10:00 am to 12:00 noon

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Attachment 4

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
740 STVCN, RM 1320
Richland, Washington

Meeting Held August 11, 1993
From 10:00 am to 12:00 noon

Action Items

<u>Action Item #</u>		<u>Description</u>
07-14-93:1	OPEN	Arrange for Ecology to attend radiation survey of 4843 AMSF. (WHC: J. G. Adler)
07-14-93:2	OPEN	Provide Ecology with copy of the radiation survey procedure. (WHC: J. G. Adler)
8-11-93:1	NEW 8-11-93	Review request to consolidate comments and provide response at or before the September 1993 UMM. (Ecology: A. D. Huckaby)
8-11-93:2	NEW 8-11-93	Provide a single sheet that could be added to the NOD Response Table that identifies all comments proposed for consolidation by the September 1993 UMM. (WHC J. G. Adler)

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Attachment 5

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
740 STVCN, RM 1320
Richland, Washington

Meeting Held August 11, 1993
From 10:00 am to 12:00 noon

TITLE - 4843 AMSF NOD RESPONSE TABLE COMMENTS PROPOSED FOR CONSOLIDATION

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4843 AMSF NOD RESPONSE TABLE
COMMENTS PROPOSED FOR CONSOLIDATION

August 11, 1993

Comment No. 2 (General)

(Subject: radiation issue)

It is proposed that the following comments be closed and consolidated into Comment No. 2: No. 54, No. 56, No. 57, and No. 58.

The closed comments will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, this comment has been closed and consolidated with Comment No. 2."

The following will be incorporated into Comment No. 2:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, the following comments have been closed and consolidated with Comment No. 2: No. 54 (General), No. 56 (4.0), No. 57 (7.3.3), and No. 58 (7.3.2)."

Comment No. 3 (General)

(Subject: soil sampling)

It is proposed that the following comments be closed and consolidated into Comment No. 3: No. 6, No. 21, No. 37, No. 38, and No 41.

The closed comments will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, this comment has been closed and consolidated with Comment No. 3."

The following will be incorporated into Comment No. 3:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, the following comments have been closed and consolidated with Comment No. 3: No. 6 (2-2/38), No. 21 (6-1/40-45), No. 37 (7-7/33-34), No. 38 (7-7/33) and No. 41 (F7-1)."

Comment No. 4 (General)

(Subject: oil analysis)

It is proposed that the following comments be closed and consolidated into Comment No. 4: No. 11 and No. 45.

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The closed comments will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, this comment has been closed and consolidated with Comment No. 4."

The following will be incorporated into Comment No. 4:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, the following comments have been closed and consolidated with Comment No. 4: No. 11 (4-1/10) and No. 45 (Appendix C)."

Comment No. 5 (2-2/15-16) (Subject: aerial photos)

It is proposed that the following comment be closed and consolidated into Comment No. 5: No. 55.

The closed comment will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, this comment has been closed and consolidated with Comment No. 5."

The following will be incorporated into Comment No. 5:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, the following comment has been closed and consolidated with Comment No. 5: No. 55 (General)."

Comment No. 7 (3-1) (Subject: past operations documents)

It is proposed that the following comment be closed and consolidated into Comment No. 7: No. 8.

The closed comment will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, this comment has been closed and consolidated with Comment No. 7."

The following will be incorporated into Comment No. 7:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, the following comment has been closed and consolidated with Comment No. 7: No. 8 (3-1/7)."

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Comment No. 10 (3-2/36-40)

(Subject: Storage of non-wastes)

It is proposed that the following comment be closed and consolidated into Comment No. 10: No. 29.

The closed comment will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, this comment has been closed and consolidated with Comment No. 10."

The following will be incorporated into Comment No. 10:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, the following comment has been closed and consolidated with Comment No. 10: No. 29 (7-3/46)."

Comment No. 15 (6-1/18)

(Subject: action levels)

It is proposed that the following comments be closed and consolidated into Comment No. 15: No. 23, No. 24, and No. 25.

The closed comments will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, this comment has been closed and consolidated with Comment No. 15."

The following will be incorporated into Comment No. 15:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, the following comments have been closed and consolidated with Comment No. 15: No. 23 (6-1/13), No. 24 (6-2/11), and No. 25 (6-2/33-35)."

Comment No. 27 (7-3)

(Subject: relief joints)

It is proposed that the following comments be closed and consolidated into Comment No. 27: No. 77, No. 78, and No. 79.

The closed comments will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, this comment has been closed and consolidated with Comment No. 27."

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The following will be incorporated into Comment No. 3:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, the following comments have been closed and consolidated with Comment No. 27: No. 77 (7-3/43), No. 78 (2-2/33-35 and 7-3/44-46), and No. 79 (7.3.3)."

Comment No. 31 (7-4/9)

(Subject: justification of number of floor samples)

It is proposed that the following comments be closed and consolidated into Comment No. 31: No. 42.

The closed comments will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, this comment has been closed and consolidated with Comment No. 31."

The following will be incorporated into Comment No. 31:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, the following comment has been closed and consolidated with Comment No. 31: No. 42 (F7-2)."

Comment No. 52 (General)

(Subject: appropriate analysis)

It is proposed that the following comments be closed and consolidated into Comment No. 52: No. 13, No. 14, No. 17, No. 20, No. 30, No. 46, No. 66, No. 68, and No. 74.

The closed comments will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, this comment has been closed and consolidated with Comment No. 52."

The following will be incorporated into Comment No. 52:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, the following comments have been closed and consolidated with Comment No. 52: No. 13 (4-2/1), No. 14 (4-2/23), No. 17 (6-1/22), No. 20 (6-1/37), No. 30 (7-4/1), No. 46 (Appendix D), No. 66 (Appendix G/Table G-1), No. 68 (Appendix G-5/Table G-1), and No. 74 (7-3/12-13)."

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Comment No. 59 (7-6/36-40)

(Subject: copy of EII manual)

It is proposed that the following comment be closed and consolidated into Comment No. 59: No. 76.

The closed comment will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, this comment has been closed and consolidated with Comment No. 59."

The following will be incorporated into Comment No. 59:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of 8/11/93, the following comment has been closed and consolidated with Comment No. 59: No. 76 (7-2/17-0)."

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Attachment 6

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
740 STVCN, RM 1320
Richland, Washington

Meeting Held August 11, 1993
From 10:00 am to 12:00 noon

TITLE - COMMENTS ON THE DRAFT HANFORD FACILITY PERMIT, PP. 36 TO 39.

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COMMENTS ON THE DRAFT HANFORD FACILITY PERMIT

36 of 223
03/16/92

Condition: Definitions
Page, lines: Page 9, lines 7-9, 13-15
Comment/Action: Delete the words "any of" in lines 07 and 13, "(a) through (j)" in line 08, and "(a) through (l)" in lines 13 and 14. Add words:

for Administrator, Agency, Dangerous Waste, Department, Director,
Facility, and Permit,

in lines 08 and 13-14.

Justification: These lines specify that certain definitions supersede any definition of the same term in the FFACO or in relevant regulations. The only definitions that should supplement those in the FFACO or regulations are the definitions of Administrator, Agency, Dangerous Waste, Department, Director, Facility, and Permit. The FFACO is a binding agreement among the DOE-RL, the Department, and the Agency. As such, the FFACO must prevail over any directly conflicting language in the Permit that is sought to be imposed by one party.

Condition: Definitions (Best Efforts)
Page, lines: Page 9, lines 39-45
Comment/Action: Delete the definition of "Best Efforts" in its entirety.

Justification: As stated in the Draft Permit, the definition on Page 9 is only applicable to Part IV of the Draft Permit. The term "best efforts" appears once in Part IV of the Draft Permit at condition IV.B.2., on Page 83, line 44. The text refers to "...Permittees' best efforts, pursuant to Paragraph 106 of the FFACO...". It is clear that "Best Efforts" is governed by Paragraph 106 of the FFACO, which does not comport with the definition in this permit condition. If there is a need to provide further clarification as to the meaning of these words as used in the FFACO, then a definition should be considered for inclusion in the FFACO. To define in the permit a term used in the context of the FFACO is inappropriate.

Condition: Definitions [Contractor(s)]
Page, lines: Page 10, lines 1-3
Comment/Action: Delete.

Justification: This provision serves no purpose in a permit issued to the owner/operator, U.S. Department of Energy-Hanford Facility.

Condition: Definitions (Dangerous Waste)
Page, lines: Page 10, lines 10-11
Comment/Action: Add words "the hazardous component of" before the word "mixed". Add the following sentence to the end of the definition:

Dangerous waste does not include the source, special nuclear, and
by-product material components of mixed waste.

Justification: These additions clarify that the Department's jurisdiction is over the hazardous components of mixed waste, not the radioactive components,

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in accordance with RCRA Section 6905(a), 10 CFR Part 962, and EPA's Notice Regarding State Authorization to Regulate the Hazardous Components of Radioactive Mixed Wastes under RCRA, 51 Fed. Reg. 24,504 (July 3, 1986); also refer to RCW 70.105.109 (Department might regulate mixed wastes "to the extent it is not preempted by federal law").

The AEA vests the DOE with the responsibility to assure the development, utilization and control of atomic energy for military and for all other purposes vital to the common defense and security. (42 U.S.C. § 2012(a)). The AEA also provides that The processing and utilization of source, byproduct, and special nuclear material must be regulated in the national interest and in order to provide for the common defense and security and to protect the health and safety of the public. (42 U.S.C. 2012(d)). In accordance with the AEA, the DOE and its predecessor agencies have developed a comprehensive program for the regulation of source, special nuclear, and byproduct materials in both product and waste forms.

In 1976, Congress enacted the RCRA, a comprehensive cradle-to-grave management scheme, administered by the EPA and authorized states, for the generation, treatment, disposal, and recycling of hazardous waste. The scope of the RCRA program is delineated by the definitions of "solid waste" and "hazardous waste". The RCRA 1004(5) defines the term "hazardous waste" as a subset within the universe of "solid wastes", which are defined in Section 1004(27).

The definition of "solid waste" in RCRA expressly excludes "source, special nuclear, or byproduct materials" as defined by the AEA. Those excluded materials are regulated under the AEA either by the DOE or the Nuclear Regulatory Commission. Because the materials are not solid wastes, the materials cannot be hazardous wastes because all hazardous wastes must first meet the definition of a solid waste.

In 1987, the DOE, after consultation with the EPA and other interested parties, issued a Final Interpretive Rule (10 CFR Part 962) regarding the definition of "byproduct material" set forth in Section 11(e)(1) of the AEA (May 1, 1987, 52 FR 15937) for purposes of RCRA applicability. Under the rule, the AEA term "byproduct material" means:

any radioactive material yielded in or made radioactive by exposure to the radiation incident to the process of producing or utilizing special nuclear material.

The Final Rule clarifies the DOE's obligation under RCRA as applied to "radioactive mixed waste" i.e., those radioactive waste substances that are also "hazardous" within the meaning of RCRA. The Final Rule states that "the words 'any radioactive material' as used in the term 'byproduct', refer only to the actual radionuclides dispersed or suspended in the waste substance. The nonradioactive hazardous component of the waste will be subject to regulation under the Resource Conservation and Recovery Act." The principle effect of the Final Rule is that handlers of radioactive mixed wastes, such as the DOE, are subject to dual regulations; the handler must comply with both the requirements of the AEA for the radioactive component and RCRA regulations for the management of the nonradioactive hazardous waste component.

The Preamble to the DOE's May 1, 1987 byproduct rule recognizes that the DOE is the federal agency responsible for authoritatively construing the requirements of the AEA, as that Act applies to DOE facilities.

... it seems apparent that RCRA was intended to have some applicability to materials that were already regulated under the AEA. Section 1006(a) of RCRA, ..., specifies that as to 'any activity or substance' subject to the AEA, RCRA regulation must yield, but only to the extent of inconsistent requirements of the AEA. The archetypal substances that can fairly be described as "subject to" the AEA are substances containing source, special nuclear and byproduct material, to which the AEA expressly is directed." (52 FR at Col. 1, page 15940).

The preamble explains the effect of language of RCRA and AEA as follows:

Read together, DOE believes that the definitional exclusion and the language of section 1006(a) are correctly understood to provide for the regulation under RCRA of all hazardous waste, including waste that is also radioactive. RCRA does not apply to the radioactive component of such a waste however, if it is source special nuclear or byproduct material. Instead, the AEA applies to that radioactive component. Finally, if the application of both regulatory schemes proves conflicting in specific instances, RCRA yields to the AEA. (emphasis added) (Id. at Col. 2, para 1).

In addition the preamble states:

While DOE does not anticipate that adoption of today's final rule will lead to frequent cases of 'inconsistency', section 1006(a) provides critical assurance that the implementation of the final rule will create no impediment to the maintenance of protection of radiological hazards as well as DOE's accomplishment of its other statutory responsibilities under the AEA. (emphasis added). (Id. at Col. 2, Para 2).

The DOE's byproduct rule therefore appropriately recognizes the dual AEA/RCRA regulation of mixed waste while preserving the exclusion of the source, special nuclear, and byproduct component of the waste from regulation under RCRA, and also recognizes the supremacy of AEA authority in the event of a conflict. This approach has been most recently confirmed by the Agency's Clarification Notice of September 23, 1988, entitled Clarification of Interim Status Qualification Requirements for the Hazardous Components of Radioactive Mixed Waste, 53 Fed. Reg. 37,045. In the September 23, 1988 Notice, the EPA committed to a strategy of minimizing the impact of RCRA regulations by developing an approach for joint regulation of radioactive mixed waste "that will affect program implementation in the least burdensome manner practicable." In terms of the inconsistency issue, the EPA recognized that "implementation of the dual regulatory program for radioactive mixed waste management might result in instances where compliance with both sets of regulations is not only infeasible but undesirable." In cases where there was an actual inconsistency, the EPA acknowledged that the AEA would take precedence, and the inconsistent RCRA requirement would be inapplicable.

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The FFACO likewise contemplates that the DOE, not the Department, will have authority over radioactive waste pursuant to the AEA. The FFACO at Article V defines mixed waste as follows:

Radioactive Mixed Waste" or "Mixed Waste" are wastes that contains both hazardous waste subject to RCRA, as amended, and radioactive waste subject to the Atomic Energy Act of 1954, as amended.

Under Article I, Jurisdiction, the parties agreed that the state of Washington would regulate the generation, treatment, storage, and disposal of hazardous waste pursuant to the state HWMA and regulations governing the management of hazardous wastes (WAC 173-303). As explained previously, RCRA excludes source, special nuclear, and byproduct materials from its definition of solid (and therefore hazardous) wastes. Article I further states that "nothing in this Agreement shall be construed to require DOE to take any action pursuant to RCRA which is inconsistent with the requirements of the Atomic Energy Act of 1954, as amended" (FFACO, Art. I, ¶ 5). The DOE's authority to regulate radioactive materials was therefore clearly preserved in the FFACO. The FFACO provides for CERCLA removal actions at certain operable units. Radioactive materials fall within CERCLA's definition of hazardous substance. This does not, however, bestow any authority on the Department to regulate radioactive materials as a hazardous waste under the RCRA permit.

Therefore, any assertion by the Department that the source, special nuclear, or byproduct component of a mixed waste is subject to regulation under RCRA or the Department's Dangerous Waste Regulations is inconsistent with and preempted by federal law as well as being inconsistent with the FFACO. It also would be outside the scope of activities that can be subject to regulation at a federal facility pursuant to Section 6001 of RCRA (42 U.S.C. 6961). To ensure the issue does not result in future misunderstanding, the definition must be modified as proposed herein.

Condition: Definitions (Days)
Page, lines: Page 10, lines 13-14
Comment/Action: Delete definition of "Days". Specify that the FFACO definition is incorporated.

Justification: This term is defined in Article V of the FFACO. The FFACO definition was agreed to by the parties and is controlling.

Condition: Definitions (Facility)
Page, lines: Page 10, lines 27-32
Comment/Action: Delete this definition and replace with the facility description included in WAC 173-303-040, which defines "facility" as

all contiguous land, and structures, other appurtenances, and improvements on the land used for recycling, reusing, reclaiming, transferring, storing, treating, or disposing of dangerous waste.

Distribution:

J. G. Adler	WHC	H6-23
J. R. Bartz	GSSC	A4-35
R. C. Brunke	WHC	H6-23
R. M. Carosino	RL	A4-52
D. L. Duncan	EPA	HW-106
O. A. Farabee	RL	N1-39
R. G. Hastings	RL	N1-39
A. D. Huckaby	Ecology - Kennewick	
R. N. Krekel	RL	A5-15
P. J. Mackey	WHC	B3-15
S. M. Price	WHC	H6-23
F. A. Ruck III	WHC	H6-23
J. A. Seamans	WHC	N2-04
J. J. Wallace	Ecology - Kennewick	
J. L. Waite	WHC	B2-35
RCRA file/GHL	WHC	H6-23

ADMINISTRATIVE RECORD: 4843 ALKALI METAL STORAGE FACILITY (S-4-1) [Care of EPIC, WHC (H6-08)]

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Please send comments on distribution list to Kym D. Tarter (H6-23),
(509) 376-4701.

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